

Rory T. Kay (NSBN 12416)
John A. Fortin (NSBN 15221)
McDONALD CARANO LLP
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
Telephone: (702) 873-4100
rkay@mcdonaldcarano.com
jfortin@mcdonaldcarano.com

*Attorneys for Defendant
Aylo Premium Ltd*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MELISSA HUTCHISON aka PHOENIX
MARIE, an individual,

Plaintiff,

v.

ETHICAL CAPITAL PARTNERS, a foreign
entity; AYLO PREMIUM LTD., a foreign
corporation; DM PRODUCTIONS, a foreign
entity; DIGITAL PLAYGROUND, a foreign
entity; MIND GEEK USA
INCORPORATED, a foreign entity; MG
PREMIUM LTD, a foreign entity; DM
PRODUCTIONS, a foreign entity; DIGITAL
PLAYGROUND, a foreign entity; DANNY
MARTIN aka DANNY D, an individual;
FRANK PETOSA an individual; RYAN
HOGAN, an individual; MICHAEL
WOODSIDE, an individual; and DOES 1
through 50,

Defendants.

Case No. 2:24-cv-00673-GMN-BNW

**STIPULATION AND ORDER TO STAY
ALL DEADLINES**

**AND STIPULATION AND ORDER
EXTENDING BRIEFING DEADLINES**

(FIRST REQUEST)

Under LR IA 6-1 and 6-2 and LR 7-1, Defendant Aylo Premium Ltd. (“Aylo”) and Plaintiff Melissa Hutchison aka Phoenix Marie (“Plaintiff”), by and through their attorneys, hereby agree and stipulate to the following:

1. Plaintiff filed her First Amended Complaint on May 3, 2024. ECF No. 9.
2. On October 31, 2024, the Court granted Aylo’s Motion to Dismiss Plaintiff’s First Amended Complaint without prejudice. ECF No. 43.

1 3. On December 19, 2024, Plaintiff filed her Second Amended Complaint. ECF No.
2 53.

3 4. On March 26, 2025, Aylo timely filed its Motion to Dismiss Plaintiff's Second
4 Amended Complaint ("Motion"). ECF No. 58. Aylo's Motion raises several jurisdictional
5 arguments. *See id.*

6 5. Aylo and Plaintiff have met and conferred regarding Aylo's Motion and they each
7 agree that the matter meets Nevada's three-part requirement for a stay to all deadlines in this matter
8 pending the outcome of Aylo's Motion. *See Kor Media Grp. LLC v. Green*, 294 F.R.D. 579, 581
9 (D. Nev. 2013); *see also Turner Broad Sys., Inc. v. Tracinda Corp.*, 175 F.R.D. 554, 555-56 (D.
10 Nev. 1997).

11 6. As such, Aylo and Plaintiff stipulate and agree to stay all statutory and procedural
12 deadlines under Nevada law, the Fed. R. Civ. P., and the Court's local rules as to Aylo until the
13 Court resolves the pending motion to dismiss.

14 7. In addition to staying all deadlines pending resolution of Aylo's motion to dismiss,
15 the Parties have met and conferred and agree that extending the time to brief the opposition and reply
16 is warranted.

17 8. The Parties agree that Plaintiff's opposition, currently due April 9, 2025, should be
18 extended one week, to April 16, 2025.

19 9. The Parties additionally agree that Aylo's reply brief should be extended by one week
20 (i.e., providing Aylo two weeks to file a reply) from the filing of Plaintiff's opposition on April 16,
21 2025, such that the Reply will be due on April 30, 2025.

22
23
24
25 ///

26 ///

27 ///

28 ///

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of April, 2025, a true and correct copy of **STIPULATION AND ORDER TO STAY ALL DEADLINES** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By: /s/ Leah Jennings
An employee of McDonald Carano LLP